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ADOBE SYSTEMS INCORPORATED
and ELECTRONIC ARTS INC.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

DIGITAL REG OF TEXAS, LLC,

Plaintiff,

vs.

ADOBE SYSTEMS INCORPORATED, et al.,

Defendants.

Civil Case No. 12-CV-01971 CW (KAW)

**DECLARATION OF NATHAN
GREENBLATT IN SUPPORT OF
JOINT LETTER BRIEF OF DIGITAL
REG OF TEXAS, LLC AND ADOBE
SYSTEMS INCORPORATED RE:
DISCOVERY ISSUES AND JOINT
LETTER BRIEF OF DIGITAL REG
OF TEXAS, LLC AND ELECTRONIC
ARTS INC. RE: DISCOVERY ISSUES**

1 I, Nathan Greenblatt, declare:

2 I am an attorney with the law firm of Weil, Gotshal & Manges LLP, counsel of
3 record for Defendants Adobe Systems Incorporated and Electronic Arts Inc. (“Adobe and
4 Electronic Arts”) in the above-captioned matter. I submit this declaration based on personal
5 knowledge and following a reasonable investigation. If called upon as a witness, I could
6 competently testify to the truth of each statement herein.

7 1. Attached as **EXHIBIT 1** is a true and correct copy of Defendant
8 Electronic Art’s Responses and Objections to Digital Reg’s First Set of Requests for
9 Production, dated September 13, 2012.

10 2. Attached as **EXHIBIT 2** is a true and correct copy of an excerpt from the
11 Deposition Transcript of Alex Zvenigorodsky, dated March 27, 2013.

12 3. Attached as **EXHIBIT 3** is a true and correct copy of Electronic Arts
13 Inc.’s Responses and Objections to Digital Reg of Texas LLC’s First Set of Interrogatories
14 (Nos. 1-10), dated September 13, 2012.

15 4. Attached as **EXHIBIT 4** is a true and correct copy of Electronic Arts
16 Inc.’s Responses and Objections to Digital Reg’s First Set of Individual Interrogatories (Nos. 1-
17 4), dated March 21, 2013.

18 5. Attached as **EXHIBIT 5** is a true and correct copy of Electronic Arts
19 Inc.’s Responses and Objections to Digital Reg’s Third Set of Individual Interrogatories (Nos.
20 6-9), dated March 28, 2013.

21 6. Attached as **EXHIBIT 6** is a true and correct copy of Electronic Arts
22 Inc.’s First Supplemental Responses and Objections to Digital Reg of Texas LLC’s First Set of
23 Interrogatories (Nos. 1-10), dated April 1, 2013.

24 7. Attached as **EXHIBIT 7** is a true and correct copy of Electronic Arts
25 Inc.’s Supplemental Responses and Objections to Digital Reg of Texas LLC’s First Set of
26 Individual Interrogatories (Nos. 1-4), dated April 10, 2013.

27 8. Attached as **EXHIBIT 8** is a true and correct copy of Electronic Arts
28 Inc.’s Second Supplemental Responses and Objections to Digital Reg of Texas LLC’s First Set

of Common Interrogatories (Nos. 1-10), dated April 10, 2013.

9. Attached as **EXHIBIT 9** is a true and correct copy of Electronic Arts Inc.'s Supplemental Responses and Objections to Digital Reg of Texas LLC's Second Set of Common Interrogatories (Nos. 11-19), dated April 10, 2013

10. Attached as **EXHIBIT 10** is a true and correct copy of Electronic Arts Inc.'s Supplemental Responses and Objections to Digital Reg of Texas LLC's Third Set of Individual Interrogatories (Nos. 6-9), dated April 10, 2013.

11. Attached as **EXHIBIT 11** is a true and correct copy of Defendants' First Set of Common Requests for Production of Documents, dated September 21, 2012.

12. Attached as **EXHIBIT 12** is a true and correct copy of Plaintiff's Responses and Objections to Defendants' First Set of Common Requests for Production of Documents (Nos. 1-103), dated October 24, 2012.

13. Attached as **EXHIBIT 13** is a true and correct copy of Defendant's Subpoena to Patrick Patterson, dated February 26, 2013.

14. Attached as **EXHIBIT 14** is a true and correct copy of Defendants' Subpoena to Seth Ornstein, dated February 26, 2013.

15. Attached as **EXHIBIT 15** is a true and correct copy of Defendants' Subpoena to Eugene Phillips, II, dated February 26, 2013.

16. Attached as **EXHIBIT 16** is a true and correct copy of Plaintiff Digital Reg's First Request for Production to All Defendants, dated August 9, 2012.

17. Attached as **EXHIBIT 17** is a true and correct copy of an excerpt from the Deposition Transcript of Joseph R. Jones, dated March 22, 2013.

18. Attached as **EXHIBIT 18** is a true and correct copy of an excerpt from the Deposition Transcript of Jonathan Herbach, dated March 22, 2013.

19. Attached as **EXHIBIT 19** is a true and correct copy of Adobe Systems Inc.'s Responses and Objections to Digital Reg's First Set of Interrogatories (Nos. 1-10), dated September 13, 2012.

20. Attached as **EXHIBIT 20** is a true and correct copy of Adobe Systems

1 Inc.'s Responses and Objections to Digital Reg's First Set of Individual Interrogatories (Nos. 1-
2 3), dated March 21, 2013.

3 21. Attached as **EXHIBIT 21** is a true and correct copy of Adobe Systems
4 Inc.'s Responses and Objections to Digital Reg's Second Set of Common Interrogatories (Nos.
5 11-19, dated March 21, 2013.

6 22. Attached as **EXHIBIT 22** is a true and correct copy of Adobe Systems
7 Inc.'s Responses and Objections to Digital Reg's Third Set of Individual Interrogatories (Nos.
8 6-10), dated March 28, 2013.

9 23. Attached as **EXHIBIT 23** is a true and correct copy of Adobe Systems
10 Inc.'s Supplemental Responses and Objections to Digital Reg's First Set of Common
11 Interrogatories (Nos. 1-10), dated April 10, 2013.

12 24. Attached as **EXHIBIT 24** is a true and correct copy of Adobe Systems
13 Inc.'s Supplemental Responses and Objections to Digital Reg's First Set of Individual
14 Interrogatories (Nos. 1-3), dated April 10, 2013.

15 25. Attached as **EXHIBIT 25** is a true and correct copy of Adobe Systems
16 Inc.'s Supplemental Responses and Objections to Digital Reg's Second Set of Common
17 Interrogatories (Nos. 11-19), dated April 10, 2013.

18 26. Attached as **EXHIBIT 26** is a true and correct copy of Adobe Systems
19 Inc.'s Responses and Objections to Digital Reg's Third Set of Individual Interrogatories (Nos.
20 6-10), dated April 10, 2013.

21 27. Attached as **EXHIBIT 27** is a true and correct copy of Adobe Systems
22 Inc.'s Second Supplemental Responses and Objections to Digital Reg's First Set of Common
23 Interrogatories (Nos. 1-10), dated April 11, 2013.

24 28. Attached as **EXHIBIT 28** is a true and correct copy of Digital Reg's
25 Infringement Contentions for U.S. Patent No. 6,389,541.

26 29. Attached as **EXHIBIT 29** is a true and correct copy of Digital Reg's
27 Infringement Contentions for U.S. Patent No. 6,751,670.

28 30. Attached as **EXHIBIT 30** is a true and correct copy of an excerpt of the

1 Deposition Transcript of Juan Carlos Colosso, dated March 26, 2013.

2 31. Attached as **EXHIBIT 31** is a true and correct copy of an excerpt of the
3 Deposition Transcript of Eric Wilde, dated March 26, 2013.

4 32. Attached as **EXHIBIT 32** is a true and correct copy of an excerpt of the
5 Deposition Transcript of Michael Roberts Farley, dated March 28, 2013.

6 33. Attached as **EXHIBIT 33** is a true and correct copy of Defendants'
7 Subpoena to Intellectual Profit, dated January 3, 2013.

8 I declare under the penalty of perjury under the laws of the United States of
9 America that the foregoing is true and correct.

10 Executed on April 12, 2013, at Redwood Shores, California.

11
12 /s/ Nathan Greenblatt
Nathan Greenblatt